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Estate/of King, et al v Annucci, et al - 3-18-22 - Amy King

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

THE ESTATE OF JOSEPH P. KING, et al,

Plaintiffs,

v

Index No.: 9:20-CV-1413

ANTHONY J. ANNUCCI, et al,

Defendants.

_____X

DEPOSITION OF: AMY KING

DATE: March 18, 2022

TIME: 10:01 a.m. to 12:13 p.m.

VENUE: WebEx

Reported by Howard Hubbard

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2 APPEARANCES:

3 FOR THE PLAINTIFF:

4 HACH ROSE SCHIRRIPA & CHEVERIE, L.L.P.

5 BY: HILLARY NAPPI, ESQ.

6 112 Madison Avenue

7 New York, New York 10016

8 FOR THE DEFENDANTS:

9 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL

10 BY: AIMEE COWAN, A.A.G.

11 300 South State Street, Suite 300

12 Syracuse, New York 13202

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2 I N D E X O F P R O C E E D I N G S

3 AMY KING: Sworn

4 Direct Examination by Ms. Cowan 5

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2 STIPULATIONS

3 It is HEREBY STIPULATED by and among the attorneys
4 for the respective parties, in accordance with the Federal
5 Rules of Civil Procedure, that this deposition may be
6 taken by the Defendant at this time, pursuant to subpoena;

7 FURTHER STIPULATED, that all objections except as to
8 the form of the questions and responsiveness of the
9 answers, be reserved until trial;

10 FURTHER STIPULATED, that the witness may read and
11 sign the deposition and make any corrections to same
12 before any Notary Public;

13 AND FURTHER STIPULATED, that if the original
14 deposition has not been duly signed by the witness and
15 returned to the attorney taking the deposition by the time
16 of trial or any hearing in this cause, a certified copy of
17 the deposition may be used as though it were the original

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2 (The deposition commenced at 10:01
3 a.m.)

4 THE REPORTER: Okay. Can the witness
5 please raise your right hand?

6 Do you swear or affirm that the
7 testimony you're about to give will be the truth, the
8 whole truth, and nothing but the truth?

9 MS. KING: Yes.

10 WITNESS; AMY KING; Sworn

11 THE REPORTER: Can you please state
12 your name for the record?

13 THE WITNESS: Amy King.

14 THE REPORTER: Okay. Thank you. You
15 can put your hand down now.

16 Your -- your witness is sworn.

17 MS. COWAN: Thank you.

18 DIRECT EXAMINATION

19 BY MS. COWAN:

20 Q. Good morning, Ms. King.

21 A. Good morning.

22 Q. Can you hear me okay?

23 A. Yes.

24 Q. Okay. If you can't hear me or if
25 we glitch out or something, please let me know

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2 immediately and -- and we will figure it out. Okay?

3 A. Okay.

4 Q. My name is Aimee Cowan. I
5 represent the Defendants in the lawsuit that you and
6 your attorney have filed. I have a few questions for
7 you today about this lawsuit. A few ground rules.
8 Number one, if I ask a question, and it doesn't make
9 sense to you, please let me know. I can rephrase it
10 for you. Okay?

11 A. Yes.

12 Q. If you could just make sure that
13 your answers are audible, no shaking your head or
14 saying uh-huh, just so we can get a clear record.
15 Okay?

16 A. Yes.

17 Q. And then, lastly, this might be a
18 little hard, because we're doing this virtual, but if
19 you could just make sure you let me finish asking my
20 question before you start answering, that way we're
21 not speaking over each other. Okay?

22 A. Yes.

23 Q. Can you please state your full
24 name again for me?

25 A. Amy Lynn King.

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2 Q. Are there any other names that
3 you've gone by?

4 A. My maiden name, in the past.

5 Q. Which was?

6 A. Which was Sickles, S-I-C-K-L-E-S.

7 Q. Okay. And what is your date of
8 birth?

9 A. [REDACTED].

10 Q. Are you on any medications today
11 that could affect your ability to testify?

12 A. No.

13 Q. Have you drank any alcohol today?

14 A. No.

15 Q. Other than your attorney, have
16 you discussed this deposition with anybody else?

17 A. No. I mean, the couple family
18 members that met with the lawyer, the very first day,
19 know of it, but I haven't discussed anything going on
20 since then.

21 Q. What other family members met
22 with your attorneys?

23 A. The very -- it was just the very
24 first day to see if they would take my case, and that
25 was two of my sister-in-laws. Do you want their

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2 names?

3 Q. Sure.

4 A. Beverly Mattison, Susan
5 McCloskey, my daughter Megan King, and her cousin
6 Jeannie McBride.

7 Q. Okay. Did you review anything in
8 preparation for this deposition?

9 A. Review?

10 Q. Did you look over any documents,
11 anything like that?

12 A. No.

13 Q. Okay. Are you currently married?

14 A. No.

15 Q. Were you previously married to
16 Joseph King?

17 A. Yes.

18 Q. When did you -- when did you
19 actually meet him?

20 A. In 1992, after I graduated, so
21 like July 1992.

22 Q. And when did you officially start
23 a relationship with him?

24 A. It just kept going.

25 Q. Okay.

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2 A. It's just from there on.

3 Q. You were sort of in a

4 relationship, I guess, essentially after 1992 when
5 you graduated?

6 A. Yes. We started seeing each
7 other and then we just stayed together.

8 Q. Okay. When did you get married?

9 A. In August 14th, 1999.

10 Q. Were you ever legally divorced
11 from him?

12 A. No.

13 Q. And I -- I know you mentioned you
14 have a daughter. How many children do you have?

15 A. Two.

16 Q. How old are your children today?

17 A. Twenty-three and twenty-eight.

18 Q. And I think you mentioned you had
19 a daughter named Megan?

20 A. Yes.

21 Q. Is she twenty-eight or twenty-
22 three?

23 A. Twenty-eight.

24 Q. Okay. And what is the other
25 child's name?

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2 A. Joseph King, Jr.

3 Q. And he is twenty-three?

4 A. Yes.

5 Q. Where do they live?

6 A. They live in Clifton Park.

7 Joseph, Megan, and Joseph's girlfriend share an
8 apartment and split the expenses.

9 Q. How long have they lived there
10 under that arrangement?

11 A. They moved back down this way in
12 -- it's been a couple of years.

13 Q. Okay. And are they employed?

14 A. My daughter is, right now. My
15 son is not, at the moment.

16 Q. Where is your daughter employed?

17 A. She is a court clerk for the Town
18 of North Greenbush. And that job, she just started.

19 Q. Okay. And where was she employed
20 prior to that position?

21 A. Walgreens, in Saratoga.

22 Q. Do you know how long she was
23 employed at Walgreens?

24 A. Oh, yes, because before she
25 moved, she was in -- she transferred, so I'm just

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2 going to say five years, but she was there a while.

3 Q. Okay. So at -- at least five

4 years, probably longer?

5 A. Yes.

6 Q. All right. And you said your son

7 is currently unemployed?

8 A. Yes.

9 Q. When was the last time he was
10 employed?

11 A. Well, he's doing -- right now,
12 he's doing Grubhub, but he was at Price Chopper maybe
13 a few months ago.

14 Q. Okay. And how long was he at
15 Price Chopper for?

16 A. Oh, god, not long. I'm not quite
17 sure, but he's trying to find that job right now, so.

18 Q. Okay. What is his highest level
19 of education? Did he graduate high school?

20 A. Yes.

21 Q. All right.

22 A. And then he started -- he did a
23 year of college, and then he came back home.

24 Q. Got you. And as for your
25 daughter, what is her highest level of education?

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2 A. Bachelor's degree in criminal
3 justice.

4 Q. At some point, your husband,
5 Joseph King, he was incarcerated; correct?

6 A. Yes.

7 Q. And -- and what year was he
8 actually incarcerated?

9 A. Do you mean when he first went to
10 jail or prison?

11 Q. When he first went to jail?

12 A. That was in 2012, January 2nd.

13 Q. Okay. So that was about ten
14 years ago?

15 A. Yes.

16 Q. So let's see. Your son would
17 have been thirteen; your daughter would have been
18 eighteen?

19 A. Yeah, she was in high school -- I
20 mean twelfth grade.

21 Q. And were both your children
22 living at -- in your home at the time?

23 A. Yes.

24 Q. Prior to his incarceration -- and
25 I'm about to ask you a few questions that are a

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2 little broad, I guess, so let me --

3 A. Yeah.

4 Q. -- know if you understand them or

5 not. Prior to his incarceration, what kind of father

6 was Mr. King to your son and daughter?

7 A. He was a good father. He went to

8 any school function, any open house, teacher

9 conferences. Even if he worked all night, he picked

10 them up from school. He drove them to school. We

11 went on vacations. He was a very involved father.

12 They were close to him.

13 Q. What about helping out around the

14 house, did he do anything in that regard?

15 A. Yes. Yes, he did.

16 Q. Okay.

17 A. Yes, he -- if I was working and

18 he wasn't, he'd clean. All the -- you know, anything

19 that had to do with fixing the cars or yard work or

20 anything like that, he did shoveling.

21 Q. Anything else?

22 A. As far as -- as far as --?

23 Q. As far as helping out around the

24 house, helping you out, helping the kids out,

25 anything like that?

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2 A. Oh, yeah, I mean, he -- he helped
3 them if they -- they needed help with homework, or he
4 -- I mean, he would do dishes, vacuum, cook, as far
5 as that kind of stuff. Otherwise, I mean, as far as
6 playing with them, yes, he played with them. I mean,
7 he took them swimming. He took them to parks. He
8 took them and their friends to concerts, just normal
9 family things.

10 Q. And your children, are they both
11 the biological children of Mr. King?

12 A. Yes.

13 Q. Okay. Where do you currently
14 reside?

15 A. In East Greenbush, New York.

16 Q. And how long have you lived
17 there?

18 A. Maybe two and a half years, could
19 be three.

20 Q. Okay. So since approximately
21 2019, 2020?

22 A. Yes -- yes.

23 Q. And who lives there with you,
24 currently?

25 A. Right now, my boyfriend and I.

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2 Q. What is your boyfriend's name?

3 A. Martin Johns.

4 Q. How long has he lived with you at
5 that address?

6 A. Well, I moved in here, so for as
7 long as I moved down here.

8 Q. Okay. So he's lived with you for
9 about two and a half years?

10 A. Yes.

11 Q. Two and a half, three years?

12 A. Yes.

13 Q. Prior to your East Greenbush
14 address, where did you live?

15 A. In Port Henry, New York.

16 Q. And is that where you lived with
17 Mr. King?

18 A. Yeah -- yes, that's where I lived
19 since I met him. All his family is from up there.
20 All of my family is here.

21 Q. In East Greenbush?

22 A. Yes.

23 Q. All right. Got you. Okay. So
24 the address in Port Henry, what was that address?

25 A. 2 Jackson Street.

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2 Q. And you said you lived there

3 since 1992-ish?

4 A. Yes -- yes. I mean, there was
5 the year we moved down to North Greenbush, but then
6 we went back up.

7 Q. All right. Any plans to move
8 anywhere else in the near future?

9 A. Out of the area, no. I mean, I
10 don't know if I would get another place, but no, I'm
11 not moving away.

12 Q. You're not moving out of the
13 state or anything like that?

14 A. No.

15 Q. What is the highest level of
16 education that you have achieved?

17 A. I have an associate's degree in
18 mental health and I have a year towards my bachelor's
19 degree.

20 Q. And where did you get your
21 associate's degree?

22 A. North Country Community College.

23 Q. What year did you get that
24 degree?

25 A. Oh, boy. I want to say like

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2 2002. I don't know the exact date.

3 Q. Okay. I think you said it was in
4 mental health?

5 A. Uh-huh.

6 Q. Okay.

7 A. Yes.

8 THE REPORTER: Yeah, I need a yes, or
9 a no.

10 THE WITNESS: Yes.

11 THE REPORTER: I need a yes or no to
12 the last -- thank you.

13 THE WITNESS: Yes.

14 MS. COWAN: Sorry.

15 BY MS. COWAN: (Cont'g.)

16 Q. And that was a two-year degree?

17 A. Yes.

18 Q. Did you specialize in any
19 particular area of mental health with that degree?

20 A. It was just community mental
21 health, a lot of social services classes, counseling,
22 things like that.

23 Q. And I -- I think you said you
24 have some -- some further degree and -- and your
25 bachelor's?

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2 A. Uh-huh.

3 Q. Can you tell me about that?

4 A. Yes. That was for child and
5 family services, childcare management.

6 Q. And where did you get that degree
7 from?

8 A. I didn't finish it, but
9 Plattsburgh State.

10 Q. Okay. How far are you from
11 attaining that bachelor's degree?

12 A. Maybe a year, year and a half.

13 Q. Do you have any professional
14 certifications or licenses or anything like that?

15 A. Just a certified teaching
16 assistant.

17 Q. When you do get that certificate?

18 A. I've had it for like twenty
19 years, so maybe -- oh, 2005.

20 Q. And where did you get that
21 certificate from?

22 A. From the New York State Teachers
23 -- whatever the -- what is that -- it's through New
24 York State -- through the New York State teaching --
25 I'm just going -- sorry, I'm going blank.

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2 Q. That's okay.

3 A. Wherever you get it from the New
4 York State teaching.

5 Q. What did you need to do to obtain
6 that certification?

7 A. I already had the college credits
8 and then I was working in the field, so.

9 Q. Okay.

10 A. I just had to apply for it and I
11 got it.

12 Q. Have you ever been convicted of a
13 crime?

14 A. No.

15 Q. Are you currently employed?

16 A. Yes.

17 Q. Where are you employed?

18 A. I am employed for Achievements
19 Preschool and also St. Kateri School.

20 Q. And what position do you have at
21 Achievements Preschool?

22 A. I'm a teaching assistant, and I'm
23 currently taking over for the special education
24 teacher until they hire a new one.

25 Q. Okay. How many hours do you work

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2 at the preschool?

3 A. Just for them -- I mean, our
4 preschool is inside the Catholic school, so I do
5 before-care, then I do my regular hours for the
6 preschool, and then I stay for after-school for the
7 Catholic school. So I'm there ten hours a day, seven
8 to five.

9 Q. Okay. And how long have you
10 worked for that preschool?

11 A. Since 2019, because I got that
12 job -- like, I got that job and then I moved down
13 here.

14 Q. Where did you work prior to that
15 preschool?

16 A. Children's Development Group
17 inside Ticonderoga Elementary School.

18 Q. As a teaching assistant?

19 A. Yes.

20 Q. How long were you at that
21 particular place?

22 A. Nine years.

23 Q. I think you said you also worked
24 at St. Kittery?

25 A. Kateri.

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2 Q. Kateri?

3 A. Yes, it's a Catholic school.

4 Q. And what are your hours at that -
5 - at St. Kateri?

6 A. Well, I'm there all day because
7 our special education preschool children are
8 integrated with their teacher and they're typically
9 functioning preschoolers. So I'm there from seven to
10 five, but I'm only employed by them from seven to
11 eight in the morning, and then three to five in the
12 afternoon.

13 Q. Okay. I got you. I think you
14 said that your husband was initially incarcerated in
15 2012?

16 A. Yes, that's when -- January 2nd
17 was the first time he got arrested, yes.

18 Q. All right. Did he spend any time
19 outside of prison before then going back to prison?

20 A. Yes, he was in the Essex County
21 Jail for fourteen months. And then he got to come
22 home for -- let's see. He came home in March, went
23 back in May, so he got to come home for a few months
24 before going back in August of 2013.

25 Q. Okay.

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2 A. That's when he got sentenced to
3 prison.

4 Q. What is his date of birth?

5 A. June 3rd, '68.

6 Q. Prior to 2012 when he went to
7 jail, or -- yeah, when he went to jail, was your
8 husband employed?

9 A. Yes.

10 Q. Where was he employed?

11 A. Walmart in Ticonderoga, New York,
12 doing maintenance.

13 Q. How long was he employed there?

14 A. A while, maybe like three years.

15 Q. Why does his employment end at --
16 at Walmart?

17 A. Because he got arrested.

18 Q. Prior to Walmart, did he work
19 anywhere else?

20 A. Yes, he did. He worked for the
21 Essex County A.R.C., Mountain Lake Services.

22 Q. How long did he work there?

23 A. A long time, ten years plus --

24 Q. What was his position there?

25 A. -- is my estimate. Support staff

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2 -- direct support staff professional.

3 Q. And was he ever disciplined or
4 fired from either of those jobs?

5 A. He was fired from Mountain Lake
6 Services in 2008.

7 Q. Why is that?

8 A. Well, the supervisor that was at
9 the house he worked in at the time claimed that she
10 smelled marijuana in the garage. But she never saw
11 anything like where he'd go out and take a break.
12 And that's why he got let go.

13 Q. Okay. So someone accused him of
14 smoking marijuana on the job and then he was fired?

15 A. On the grounds, yes.

16 Q. Okay. Any other disciplinary
17 issues at either of those jobs?

18 A. No.

19 Q. What was Mr. King's educational
20 background?

21 A. He had his high school diploma
22 and he started going to college for criminal justice.

23 Q. When did he graduate from high
24 school?

25 A. '88.

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2 Q. Where did he graduate from?

3 A. Moriah Central School.

4 Q. And you said he had some college?

5 A. Yes.

6 Q. When did he start going to
7 college?

8 A. Somewheres between '92 and '94.

9 Q. How many college courses did he
10 complete?

11 A. I'm not sure.

12 Q. But he didn't complete his
13 degree; right?

14 A. No, he did not.

15 Q. Do you know why he didn't?

16 A. I think it's just because we
17 started seeing each other and we were together all
18 the time. I mean, we were young and I ended up
19 getting pregnant, and he just didn't go back.

20 Q. Other than his high school
21 diploma, some college, any other certifications or
22 licenses, or anything like that?

23 A. Yes. In high school, I think he
24 got his auto mechanic certification.

25 Q. Where did he attend college for

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2 that brief period of time?

3 A. North Country Community College.

4 Q. Prior to his incarceration in
5 2012, did Mr. King treat with any mental health care
6 professionals?

7 A. Yes.

8 Q. Where did he treat?

9 A. Do you mean he was in treatment
10 or just receiving treatment?

11 Q. Both.

12 A. He was seeing his doctor at
13 Ticonderoga Health Center. And he was also going to
14 Essex County Mental Health in Elizabethtown, New
15 York. A couple of times, he didn't feel right and he
16 went to -- trying to think of the -- Plattsburgh
17 Hospital, I'm trying to think of what it's called.
18 I'm not sure if it's -- the hospital in Plattsburgh.
19 There's only one. I'm not sure if it's Champlain
20 Valley. But he had went up there and reached out for
21 help.

22 I'm trying to think where else, it was
23 so long ago. Plattsburgh -- that's all I can
24 remember.

25 Q. Okay. Was he ever diagnosed

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2 specifically with any mental health issues?

3 A. Yes, anxiety and depression.

4 Q. Okay. With respect to the doctor
5 on Ticonderoga that you mentioned, was that a primary
6 care doctor?

7 A. Yes.

8 Q. When did he start treating with
9 that doctor for mental health issues?

10 A. It was after he was fired from
11 his job, so I'm going to estimate 2008, 2009.

12 Q. All right. And how long did he
13 treat with the doctor from Ticonderoga?

14 A. Straight up until he got
15 arrested.

16 Q. Okay. So up to 2012?

17 A. Yes. And then he --.

18 Q. Do you remember the doctor --?

19 A. Sorry.

20 Q. Sorry. I'm talking over you now.

21 Do you remember the doctor's name in
22 Ticonderoga?

23 A. He seen a couple, but I believe
24 one of them was Robert Berrick. Because the way it
25 was at Ticonderoga Health Center is, like, a lot of

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2 times your doctor wasn't available, so they'd give
3 you someone else. So he's probably seen a few.

4 Q. Okay. Okay. So he saw people in
5 that practice?

6 A. Yes.

7 Q. All right.

8 A. Yes. It was -- it was
9 Ticonderoga Health Center, but it's called Hudson
10 Headwaters.

11 Q. And did he start seeing those
12 doctors because he was fired?

13 A. Because of the way he was feeling
14 -- he was starting to feel after he got fired. He
15 was starting to feel depressed and down and not
16 right.

17 Q. Did any doctor in that practice
18 diagnose him with anxiety and depression?

19 A. Yes.

20 Q. Did anyone in that practice
21 prescribe him any medications?

22 A. Yes.

23 Q. What did they prescribe him?

24 A. He was prescribed a lot of
25 medications, on and off, like trying different ones.

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2 Oh boy, I wish I -- I wish I had them in front of me.

3 He had Zoloft. At one point, they gave him Xanax. I

4 know they gave him stuff to sleep, different --

5 different common named anxiety and depression

6 medications. I know he was on Celexa. It was like

7 trial and error. They were always changing his

8 medications.

9 Q. And why were they always changing
10 his medications? Were they not helping or working,
11 according to him?

12 A. Yes.

13 Q. Now, you mentioned Essex County
14 Mental Health in Elizabethtown; correct?

15 A. Uh-huh.

16 Q. And when did he treat there?

17 A. Just in the same timeframe. I'm
18 sorry; I don't know exact date.

19 Q. So 2008 to 2012?

20 A. Yes.

21 Q. All right. Do you know who we
22 saw at Essex County?

23 A. I don't. It was a lady. It's a
24 small place. But I don't know her name.

25 Q. Did anyone from that facility

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2 prescribe him any medications?

3 A. I believe so, yes.

4 Q. How many times did he go there?

5 Any -- any clue how often he was going to Essex

6 County Mental Health?

7 A. At least once a week.

8 Q. Okay. What services did he

9 receive there, was it like a counseling session or a
10 psychologist saw him?

11 A. No, it wasn't a psychologist.

12 Just a mental health counselor.

13 Q. So he was going to see a doctor

14 at Ticonderoga -- sorry -- at Hudson -- you said

15 Hudson Headquarters?

16 A. Headwaters.

17 Q. Headwaters?

18 A. Yeah.

19 Q. And Essex County Mental Health at

20 the same time?

21 A. Yes -- yes. I think he -- I mean

22 -- yes. I don't know how else to describe that.

23 Q. So how often per week was he

24 seeing someone for mental health counseling?

25 A. Probably once.

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2 Q. So once a week?

3 A. Once a week, and then when he
4 needed to go to the doctors, he would go to the
5 doctors. But I mean mental health knew what he was
6 taking from the doctors. They had his records.

7 Q. Right. And that was between the
8 time period of 2008 and 2012?

9 A. Yeah, everything was right in
10 that timeframe.

11 Q. Now, you said he went to the
12 hospital in Plattsburgh when he didn't --

13 A. Yes.

14 Q. -- feel right?

15 A. Yes. I can only say that,
16 because I don't know what that feels like, is he was
17 always saying he didn't feel right in the head. Now,
18 before he met me, he had a head injury. And he had a
19 head injury even while I was with him. So I don't --
20 I'm not sure if the traumatic brain injury played a
21 part.

22 But he was always saying he didn't
23 feel right in the head. So his sister took him up to
24 the hospital, to the mental health unit. And they
25 always just sent him home with a prescription. They

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2 didn't keep him.

3 Q. How often did he go up to the
4 Plattsburgh hospital for that reason?

5 A. He probably went up there at
6 least three times.

7 Q. Do you know when that was?

8 A. Just in the same -- all before,
9 from when he lost his job, to getting arrested.

10 Q. So in the time between 1992 and
11 2008, did Mr. King treat anywhere for any mental
12 health issues?

13 A. No.

14 Q. When you first met him, did he
15 have any mental health complaints?

16 A. No.

17 Q. So his first complaints of -- of
18 mental health issues came in 2008 after he was fired?

19 A. That's what I was aware of, yes.

20 Q. Now, you said that he had a
21 couple of head injuries; correct?

22 A. Yes.

23 Q. You said --

24 A. Yes.

25 Q. -- one happened before you met

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2 him?

3 A. He was in a four-wheeler
4 accident. I believe he was still in high school, and
5 he hit a cement wall. He was in a coma for a couple
6 of weeks.

7 Q. Is this based on what he told
8 you?

9 A. No, not just based on what he
10 told me. I -- I have the medical records, also.

11 Q. Okay.

12 A. Just him, his family, everyone,
13 just what I've always known.

14 Q. Was he diagnosed with a traumatic
15 brain injury at that point?

16 A. I'm not sure if he was at that
17 point. I -- I was never known of at least.

18 Q. Do you know if he treated with
19 any neurologist or any other medical professionals?

20 A. We -- we did go to a neurologist
21 at one point, and I cannot remember the time, but I
22 can tell you it was in Burlington, Vermont.

23 Q. Okay. Was he still treating with
24 that person when you met him?

25 A. No.

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2 Q. And you said --?

3 A. After.

4 Q. Sorry; go ahead.

5 A. I'm sorry. He went back again,
6 after. Over time, when he went to the doctors and
7 with this head and stuff, they sent him back.

8 Q. Okay. When was that?

9 A. It was in that same timeframe.
10 I'm sorry. I mean, I'd have to look up -- look back
11 into his medical records to see.

12 Q. What about -- you mentioned that
13 he had a second head injury when you were with him?

14 A. Yes. And that was in 2008 and of
15 which he stayed off a four-wheeler accident, but one
16 day he took my daughter's four-wheeler for a ride and
17 took a turn too sharp and the handlebars landed on
18 his head.

19 Q. What were his injuries from that
20 accident?

21 A. Just a concussion, like scraped
22 head -- oh, I apologize. And there was an incident -
23 - another incident before I met him of a serious head
24 injury.

25 Q. Okay. So there was one incident

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2 where he was on a four-wheeler in high school where
3 he had --

4 A. Yes.

5 Q. -- a head injury?

6 A. Yes.

7 Q. And then there was another
8 incident before you met him?

9 A. Yes. He was crossing the street
10 and a snowplow hit him -- hit him right in the head.

11 Q. What were his injuries from that
12 incident?

13 A. I believe he just -- he was in
14 the hospital. He wasn't in a coma. He had a scar
15 right here. I'm not sure.

16 Q. Okay. Then you said he had
17 another four-wheeler incident in 2008?

18 A. Yes. And that was the one where
19 the four-wheeler -- the handlebars landed on his head
20 and he got a concussion.

21 Q. Was he unconscious, in a coma for
22 any period of time after that?

23 A. No.

24 Q. With respect to that 2008
25 accident, did that affect his ability to work after

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2 that?

3 A. It didn't affect his ability to
4 work -- ability to work.

5 Q. So there weren't any doctors that
6 told him, hey, listen, you really can't do any manual
7 labor, or -- or anything to that effect?

8 A. No.

9 Q. Did it affect his relationship
10 with you or -- or the kids at all?

11 A. No. I mean, it was stressful,
12 but it didn't affect our relationship.

13 Q. Was he in the hospital for any
14 period of time after that accident?

15 A. Just that night.

16 Q. Did it affect his behavior in any
17 way?

18 A. No. I mean, he was embarrassed
19 and he felt guilty, and he bought the kids a puppy.
20 But, yeah, otherwise, no.

21 Q. Okay. Now, did you ever attend
22 any counseling or therapy sessions with your husband?

23 A. No. When he was out -- not
24 counseling or therapy sessions. When he was out on
25 bail from before he got sent to prison, I did go to -

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2 - because he was attending St. Joe's and he was
3 attending all the A.A. meetings and everything. I
4 did go to one of those with him, but not any mental
5 health sessions or therapy.

6 Q. So you mentioned A.A. which is
7 Alcoholics Anonymous?

8 A. Yes.

9 Q. Did Mr. King have substance abuse
10 issues?

11 A. He did drink. He didn't drink
12 every day, but when he did drink, he would -- I want
13 to -- I don't -- I'm not sure how to answer this. He
14 drank, but not every day.

15 Q. Okay. Was alcohol involved in
16 the 2008 four-wheeler incident?

17 A. Yes.

18 Q. Do you know how much he had drank
19 before that incident happened?

20 A. No, I don't because I had taken
21 my kids to the movies that day.

22 Q. Okay. Was your husband ever
23 arrested for anything related to any substance use?

24 A. If -- not to my knowledge. If he
25 was, then I had no clue that he was.

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2 Q. Okay. What about any driving
3 while impaired, driving while intoxicated, anything
4 like that?

5 A. No.

6 Q. Did he have any substance abuse
7 issues with respect to drugs?

8 A. He smoked pot every once in a
9 while. It was not around --.

10 Q. Was he ever --?

11 A. I'm sorry. Go ahead.

12 Q. Go ahead.

13 A. Not around us, so as far as how
14 often? I don't know, but I mean, because he didn't
15 do it in the house, so.

16 Q. Was he ever arrested for
17 possessing any narcotics or recreational drugs?

18 A. No.

19 Q. Now, you mentioned A.A. Did he
20 do any substance abuse programs prior to 2012?

21 A. No.

22 Q. Why was he enrolled in the A.A.
23 program after he was incarcerated?

24 A. He was trying to just do
25 everything he could do. Just -- I mean, it was a

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2 wake -- well, I was told it was a wake-up call, and
3 he was just trying to do everything he could do
4 before he was going back to prison.

5 Q. You said you were told it was a
6 wake-up call. Who -- who told you?

7 A. I mean, he told me -- the way I
8 believed it was that, you know, because he was so
9 sorry and everything, and that he just felt he needed
10 to do everything he needed to do before he goes to
11 prison.

12 Q. Okay. Prior to 2012, did his
13 alcohol use affect his relationship with you or with
14 the kids?

15 A. It never affect with the kids.
16 Where it affected me, but I come from a family where
17 nobody drinks and I don't drink. So even if he's
18 drinking a little, of course, it bothers me. But
19 nothing to the point where we were separating or
20 divorcing or anything like that. But was it
21 stressful? Yes.

22 Q. How often did he drink prior to
23 2012?

24 A. Like if he was off on the
25 weekend, he'd have some drinks, or if we were to go

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2 to a wedding or something, he would have drinks.

3 It's just when he did drink, he would drink a lot.

4 Q. And you said it was stressful for
5 you when he did drink?

6 A. If he drank a lot, yes, just
7 because I don't -- I don't drink so I don't want to
8 be around somebody, whether they're being nice or I
9 just -- who wants to be around someone like that.

10 Q. Okay. When he would drink, was
11 his behavior stressful to you?

12 A. Yes, just because you can't have
13 a conversation with somebody who's drinking. But he
14 didn't do anything to us or -- you know, I mean, the
15 kids didn't pay attention. So it wasn't anything.
16 There were no fights or anything. It was just I
17 didn't like --.

18 Q. And you said that -- go ahead.

19 A. No, it's just like I didn't like
20 it. That's all.

21 Q. You said that he smoked pot
22 occasionally, prior to 2012?

23 A. Right. Yes.

24 Q. How -- how often would you say he
25 smoked pot?

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2 A. Maybe I shouldn't have said

3 occasionally, but a few times a week.

4 Q. Okay. Did it bother you that he

5 smoked pot a few times a week?

6 A. No, because he didn't do it

7 around us.

8 Q. Did he have any issues with any

9 other recreational drugs, any other substances?

10 A. No. If he did, it's a surprise

11 to me.

12 Q. Other than the three incidents

13 that we talked about, the two --

14 A. Yes.

15 Q. -- before you met him and the one

16 after you met him, any other head injuries that you

17 know of?

18 A. I know he went skiing once and he

19 hit a tree, but I mean, I wasn't there. I don't

20 think it was anything he -- where he had to go to a

21 hospital or anything like that. So that -- those are

22 the only three that I am aware of.

23 Q. Okay. That incident with skiing,

24 do you know when that happened?

25 A. No, I don't.

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2 Q. Was he ever prescribed any
3 painkiller pills or anything that you knew of to be a
4 painkiller prior to 2012?

5 A. I'm sure he was, but nothing that
6 stood out to me or anything that he would have taken
7 for a long time. Mostly, it was just all the
8 depression medications and they gave him stuff to
9 help him sleep.

10 Q. During that time period of 2008
11 to 2012 when you said that he was prescribed mental
12 health medications --

13 A. Yes.

14 Q. -- did there come a point in time
15 where he refused to take them?

16 A. I don't think so. I don't --
17 trying to think back. I don't think so because when
18 he was incarcerated, they -- when he first went to
19 county jail, they continued giving him medications
20 there the whole time. And when he left, before he
21 was sentenced to prison, they sent him home with his
22 medications.

23 Q. Do you know any medications that
24 he liked, that he preferred, that -- that seemed to
25 work for him?

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2 A. I don't remember what he was

3 taking in the jail, but beforehand, honestly, I

4 didn't really pay attention. He just took his -- but

5 I just know they switched him a lot between

6 medications.

7 Q. Okay. You may have already said

8 this, but I forgot. Between 2008 and 2012, did he

9 have any jobs between that time period?

10 A. Yes, Walmart.

11 Q. That was Walmart. Okay. What --

12 what period of time did he work at Walmart during

13 that time period?

14 A. It was about like two or three

15 years.

16 Q. What crime was he convicted of

17 that led to his incarceration in 2012?

18 A. Arson.

19 Q. Was he convicted by a jury or did

20 he plead guilty to that charge?

21 A. He took a plea deal.

22 Q. What was his sentence?

23 A. Four to twelve.

24 Q. Did you discuss his crime with

25 him at all?

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2 A. Oh, yes. Yes. I was still in

3 shock when he was in jail because it was -- I've

4 never been through anything like that. Like I've --

5 and he's never been arrested, at least when I was

6 with him. I mean, I've never known him to be

7 arrested. And it was a small town and it was just

8 awful. Yes, I did.

9 Q. Was it stressful for you around

10 the time that he was arrested and -- and --

11 A. Yes.

12 Q. -- went to jail?

13 A. Yes.

14 Q. Why was it stressful for you?

15 A. Well, it was embarrassing. It

16 was stressful. It was a small town. My kids

17 attended that town, the -- it happened in that -- my

18 kids went to school in that town. It happened in

19 that town. Everybody knows everybody. I worked -- I

20 worked in a school. I mean, it was in the newspaper.

21 It was -- I'm sorry; I thought somebody was talking.

22 Q. No.

23 A. Just not knowing -- I wasn't home

24 that night, so trying to figure out where he was,

25 what happened, is this real, everything. I mean, it

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2 was the worst thing that could happen.

3 Q. At that time, where were you
4 working?

5 A. I was working at the same job. I
6 was working for Children's Development Group in
7 Ticonderoga Elementary School.

8 Q. Okay. And what was your salary
9 at that time?

10 A. It was low, maybe seventeen
11 thousand for a ten-month salary.

12 Q. Okay. And Mr. King was fired
13 from Walmart as a result of his arrest?

14 A. Yes, because he didn't come to
15 work so --.

16 Q. Okay.

17 A. He couldn't go back.

18 Q. Why was he charged with arson?

19 A. Why? Because he was committed --
20 he was accused of setting fire to his old job at
21 night.

22 Q. Did he ever talk to you about
23 whether or not he actually did commit that crime?

24 A. No. He always, right up until
25 the last day, whenever it was brought up, he said he

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2 doesn't remember.

3 Q. Do you know whether he had been
4 drinking alcohol that night?

5 A. Yes.

6 Q. He had been drinking alcohol?

7 A. Yes.

8 Q. Okay. Do you know how much he
9 drank?

10 A. I was told it was liquor --
11 straight liquor with his anxiety meds.

12 Q. Do you know what anxiety
13 medication he was on at the time?

14 A. I don't remember. I mean, I
15 could say Celexa, but I don't know.

16 Q. Okay. All right. So he was
17 sentenced to four to twelve years in prison?

18 A. Yes.

19 Q. And did he have an opportunity to
20 go before a parole board?

21 A. Yes.

22 Q. Do you remember when he went
23 before a parole board for the first time?

24 A. It would have been after he did
25 four years. It might have been three years, like

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2 when his minimum time came up.

3 Q. All right. And -- and did you
4 attend that parole board hearing or did you just hear
5 about it?

6 A. No. No, we couldn't attend it.
7 It was just -- they did it in there.

8 Q. I'm assuming he was denied parole
9 at that time?

10 A. Yes.

11 Q. Do you know why he was denied
12 parole?

13 A. At that time, I don't think --
14 and I don't know if this is a reason, but I don't
15 think he had had all his programs done that you have
16 to have to finish, to be released.

17 Q. Do you know what programs those
18 were?

19 A. I know he had to do -- I think
20 one was related to maybe an alcohol or drug program.
21 I just can't think of the actual program on my -- at
22 the top of my head right now.

23 Q. Was the acronym A.S.A.T.?

24 A. Yes -- yes -- yes, it was.

25 Q. Do you know why he hadn't

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2 completed that program yet?

3 A. That early on, it's just -- he
4 just was waiting to get into it. It just -- he
5 didn't complete it yet.

6 Q. Okay. When he was denied parole,
7 what year was that?

8 A. I want to say 2018, but it could
9 have been 2017.

10 Q. When was his next opportunity to
11 go before the parole board?

12 A. A couple of years later.

13 Q. Okay. So maybe 2019?

14 A. No. I think it was maybe 2020.

15 Q. Are you aware of any misbehavior
16 tickets he received while he was in prison?

17 A. Misbehavior, no, I'm not sure --
18 like misbehavior, can you like rephrase that? I mean
19 --

20 Q. Sure.

21 A. -- misbehavior?

22 Q. Yeah, so in prison, there are
23 certain directives and policies and if -- if an
24 inmate violates those policies, they get what's
25 called a misbehavior ticket. And they can have a

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2 hearing after they get that ticket and they can have
3 witnesses testify and things like that. Are you
4 aware of him receiving any misbehavior tickets like
5 that?

6 A. No.

7 Q. Okay. Did he discuss with you,
8 at any point, any of his substance use while he was
9 in prison?

10 A. Yes.

11 Q. What did he tell you about that?

12 A. Well, it took a while, but he had
13 told me once that he had used Suboxone. That was the
14 only time that I've ever known of that.

15 Q. When did he tell you that?

16 A. It was while he was at Mid-State
17 Correctional Facility. It was -- honestly, I don't
18 know.

19 Q. Did he told you that he had
20 gotten in trouble for using Suboxone while he was in
21 Mid-State?

22 A. In trouble? I don't think so.

23 Q. So when he told you that, did he
24 tell you that he had been using it, or he used it
25 once, or what was the conversation like?

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2 A. I'm trying to remember, trying to
3 think back to the conversations. I think it came up
4 because maybe he was going to get drug tested in his
5 program. I'm trying to think. That might be in one
6 of the programs he was in. It could be in -- it
7 could have been when he finally got in ASAT. And I
8 believe from what he told me, they give you drug
9 tests because you would be kicked out if --.

10 Q. Was he nervous that he was going
11 to be drug tested because he had taken Suboxone?

12 A. Yes. And I didn't even know what
13 Suboxone was, like I had to Google it.

14 Q. Did he tell you where he got it
15 from?

16 A. It's all over the place in there.
17 Everything's in there. He didn't tell me directly
18 who he got it from.

19 Q. Okay. But it wasn't actually
20 prescribed to him; right?

21 A. Oh, no.

22 Q. Now, when he was transferred to
23 Mid-State Correction Facility, did you still reside
24 in Port Henry at the time?

25 A. Yes.

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2 Q. How far is that from Mid-State?

3 A. Franklin? Franklin Correctional,

4 is that what you said, Franklin Correctional?

5 Q. No. Mid-State.

6 A. Mid-State Correctional Facility

7 from my home?

8 Q. Yes.

9 A. Three and a half hours.

10 Q. Had he been convicted of any

11 crimes, prior to 2013, to your knowledge?

12 A. No.

13 Q. Do you know why he was

14 transferred to Mid-State?

15 A. Yes, because of his medication

16 level, it put him at a -- he was transferred because

17 of his medication level. At Franklin, his dose went

18 up and that put him at a different level. And Mid-

19 State has the mental health on their grounds, and

20 that's why he got transferred.

21 Q. What medication was he taking

22 while at Franklin?

23 A. I don't know, but he was on

24 depression and sleeping medications there.

25 Q. Okay. So after he was

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2 incarcerated in 2012-2013, was he diagnosed with any
3 mental health conditions after that?

4 A. Yes. It was still depression
5 and, at Mid-State, I -- I always kept in contact. I
6 mean, my husband and I were on the phone -- any
7 chance he could get on the phone, he called. He
8 called my cell phone no matter where I was. And I
9 visited every single weekend and I kept in contact
10 with his counselors.

11 And in Mid-State, I kept in contact
12 with Hal Meyers, the chief of mental health. And he
13 had told me, at one point, that he had diagnosed him
14 with social adjustment disorder, because most inmates
15 at that point could adjust to life in there, and he
16 couldn't. He just wasn't adjusting, which who would
17 --

18 Q. Okay.

19 A. -- who would be adjusting in
20 prison. Sorry; I'm just saying.

21 Q. Let me back you up for one
22 second. When was your husband transferred to Mid-
23 State?

24 A. Gosh, let's see. 2013, he -- he
25 first went to Downstate to get classified. Then they

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2 sent him up to Franklin. I think he was only in
3 Franklin for a couple of years. So he went to prison
4 in 2013; he was in Downstate Correctional Facility
5 for a while until he got classified.

6 And then they transferred him to
7 Franklin Correctional Facility, so he was there --
8 let's see. I'm just going to say 2015, but I'm not
9 sure.

10 Q. That's fine. Were you aware of a
11 suicide attempt that your husband had made in July of
12 2016?

13 A. Yes.

14 Q. How did you become aware?

15 A. Because an inmate called me to
16 tell me.

17 Q. What inmate called you?

18 A. I have no idea. They didn't give
19 me their name. They just called me and they said I
20 want to let you know that there was an incident with
21 your husband, he's okay, but he can't call you right
22 now and he's with -- I don't know. I don't remember
23 if he said mental health, the doctors, or what, but I
24 want to let you know he's okay.

25 So I called this counselor. Nobody

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2 knew anything. So I got no answers. So I said,
3 well, my cousin's wife is a lawyer, I'm going to have
4 her call and see if she can get any answers. And
5 well, of course, you have to have permission to speak
6 to her because -- but no, no answers.

7 Q. You should you called his
8 counselor. Who was that?

9 A. It was -- the chief of mental
10 health was either Meyer or Meyers and the counselor
11 was the opposite, was either Meyer -- I believe
12 Meyer. And he had -- he had no -- he had no idea
13 that that was going on.

14 Q. Okay. And then you said you
15 called your cousin's wife, who is a lawyer?

16 A. Yes, because I wasn't getting any
17 answers. So I figured, well, maybe she can get some
18 answers if she called. And she couldn't. And plus,
19 you had to have -- you know, there had to be written
20 permission from him to speak to her, so.

21 Q. What is your cousin's wife's
22 name?

23 A. At the time, it was Angela Kelly.
24 She's married to him now, but at the time, they
25 weren't married.

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2 Q. Did you ever actually speak to
3 anybody from DOCCS or from Office of Mental Health
4 about the suicide attempt?

5 A. Nobody would tell me anything. I
6 -- I was always in contact with Hal Meyers, the chief
7 of mental health. I mean, gosh, they were probably
8 tired of me, I called so much. And I even visited
9 him in mental health, took the little green cross on
10 the property to make sure that he was still standing.
11 And I was very involved.

12 No. He had told me, my husband, that
13 he was in the stairway alone and he attempted it.
14 And of course, he fell. Well, he had a mark on his
15 nose. And all the inmates were like you're going to
16 get written up if you don't tell, you know, because
17 they check for marks and stuff, apparently.

18 And so he went and told, himself, and
19 they sent him over to Mental Health.

20 Q. Did he tell you why he attempted
21 suicide at that point?

22 A. Just that he couldn't -- just he
23 couldn't take being in there. He just felt like he
24 was never coming home and he just cannot take being
25 in there.

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2 Q. Up to that point, had he ever

3 said anything to you about wanting to commit suicide

4 or -- or anything like that?

5 A. No, but he was having -- he was

6 having a hard time being there. I mean, he cried

7 practically every day. That's why I made sure that I

8 visited every single weekend for seven years. If I

9 missed a weekend, then it was a blizzard. But I made

10 sure he had his packages, made sure he had his

11 commentary, made sure he had pictures of us, letters,

12 people were writing him to keep him going to get him

13 through this.

14 Q. Did he indicate to you that he

15 would ever try to take his life again?

16 A. I don't think so, no -- no,

17 because I did bring that up before, and he promised

18 me that he would never do that again. I mean, it was

19 -- I mean, he promised that he would never do that,

20 that even if he thought that, he could never do that

21 to us and never leave his children.

22 Q. When did he say that to you?

23 A. It was just in casual

24 conversation all the time, just if it ever came up

25 over time.

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2 Q. So he --?

3 A. Right up --.

4 Q. Sorry; go ahead.

5 A. Right up the whole time, right up
6 until he passed away, like whenever he was feeling
7 extremely down.

8 Q. So he said that, multiple times
9 to you, that he would never try to do that again?

10 A. Yes. And I had told him -- he
11 was always afraid to go over to Mental Health because
12 the way they -- he was treated, I had always said, if
13 I have any indications or anything, you say anything,
14 that's it, I'm getting on the phone with Mental
15 Health and I'm letting them know how you feel.

16 Q. You said he was afraid to go to
17 Mental Health because of how he was treated?

18 A. Yes.

19 Q. What do you mean by that?

20 A. Well, from what he told me when
21 he was over there, like he had -- just the way he was
22 treated by the C.O.s. We all know not all C.O.s are
23 perfect. You know, if he had a hard time laying down
24 and he was pacing or something, they would threaten
25 him and tell him to get back in bed.

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2 When I -- my daughter and I went to

3 visit him in Mental Health, we took the bus over.

4 Then it was a little room and a guard sat outside the

5 door, and we stayed there all day. And this is when

6 he first went into Mental Health. And I understand

7 that it's a prison. I get it. But he still had his

8 -- they hadn't been giving him anything, like he

9 didn't get any -- like a new -- any clean clothes or
10 anything.

11 And like I said, I get it, it's a

12 prison. It's not, you know, a nice place to be, but

13 he looked awful. And so I remember saying to the

14 guard, you know, can he get his clean clothes? And

15 he told me, well, this isn't Boy Scouts. Well,

16 obviously, it's not Boy Scouts, but you could still

17 get him his clean clothes.

18 And he did get them after that,

19 because when he called me, I made sure of it, but --

20 just sorry, I'm just -- now I'm getting like

21 aggravated, not towards you, towards the situation.

22 So I'm rambling on.

23 Q. That's okay. So my understanding

24 then is that he had issues with the correction

25 officers and how they treated him versus the mental

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2 health counselors and how they treated him?

3 A. He barely seen any mental health
4 counselors there. You know, he's supposed to be
5 getting this counseling, but he barely seen them. I
6 mean, I was always calling his social worker, Mrs.
7 Palladino, or -- and I wouldn't even get any answers.
8 Like it was all just like -- I mean, I should have
9 just been in there, counseling him. It's -- I don't
10 know; it's ridiculous.

11 Q. So we have the July 2016 suicide
12 attempts. And then obviously, November 2018
13 happened.

14 A. Right.

15 Q. Are you aware of any other
16 suicide attempts that he made?

17 A. No.

18 Q. The reason why I asked that is
19 because your amended complaint indicates that there
20 may have been another attempted suicide. And I
21 wasn't sure if you were aware of when or if that
22 actually happened or not.

23 A. No, I'm not aware.

24 Q. Okay. After that July 2016
25 attempt, was your husband prescribed any other

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2 medication, any different medication?

3 A. He was on and off medication in
4 there. And when he was off it, I don't think he was
5 weaned off it. I think it was cold turkey and you're
6 not supposed to do that.

7 Q. Did you ever communicate with
8 anyone at DOCCS or any mental health people about not
9 allowing your husband to have shoelaces?

10 A. No, because, for one thing,
11 that's not my responsibility. That's theirs. I
12 mean, they all had sneakers and stuff. I mean, that
13 didn't cross my mind. I don't work there. He's
14 under mental health supervision, whether it's DOCCS,
15 you know, in prison or not. They're the ones that
16 shouldn't be giving them shoelaces. It shouldn't be
17 coming from me.

18 Q. Did you ever ask any staff about
19 any policies regarding shoelaces?

20 A. No. They just -- I knew in -- I
21 think in county jails, you weren't allowed to have
22 them. But then, it just didn't cross my mind. I
23 mean, I was overwhelmed. I'm trying to take care of
24 my kids. I'm trying to survive. He does this. He's
25 in prison on top of it, and then -- no, it didn't.

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2 I believe he was put in a room after

3 that, without shoelaces. Why he got them back, I

4 don't know.

5 Q. When you say after that, you mean

6 after the July 2016 attempt?

7 A. I think so. But another thing

8 is, okay, you put him back in general population.

9 What are you going to do, take every inmate

10 shoelaces? You're allowed to have sneakers there.

11 You can buy them sneakers. So how's that work? I

12 mean, everybody has sneakers.

13 Q. So if he was in general

14 population, he would have access to sneakers, just in

15 general, I guess?

16 A. If somebody wanted to give him

17 his shoelaces. But he was allowed to have sneakers,

18 so he had his own.

19 Q. Do you know if your husband had

20 any jobs while he was at Mid-State? Was he assigned

21 to any particular jobs?

22 A. Yes. And I'm trying to remember

23 what it was. I think he was a porter. I'm not sure

24 if that was at Mid-State or Franklin. I think he

25 did. I just don't remember. I know, at Franklin, he

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2 was a porter because the C.O., whenever I came to
3 visit, was always saying such nice things about him.

4 Q. Okay. Any other job that you're
5 aware of?

6 A. I think he had one. I just don't
7 remember what it was.

8 Q. Okay.

9 A. I mean he was there for so many
10 years and I spoke every day, so much information I --
11 I don't remember.

12 Q. One of the Defendants that you
13 have in this case, and you've mentioned her before,
14 is Jami Palladino.

15 A. Okay.

16 Q. Yeah, she -- she was one of the
17 counselors for -- for O.M.H. Did you ever exchange
18 any correspondence with her? Ever send her any
19 letters? Did she ever send you anything?

20 A. I talked to her. No, we never
21 had exchange of letters, but we did speak on the
22 phone.

23 Q. All right. How often did you
24 speak on the phone, how many times?

25 A. Just a few times.

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2 Q. When was your conversations with
3 her?

4 A. I don't know. Whenever he was in
5 -- well, when he was in -- well, when he was in
6 Mental Health, and when he wasn't in Mental Health,
7 I'd call and, you know, just touch base or if I had
8 any questions. I don't remember time, dates.

9 Q. Okay. Would it have been after
10 the July 2016 incident?

11 A. Yes -- yes.

12 Q. Do you speak to her at all before
13 that incident?

14 A. If I did, I don't remember. It
15 wasn't until he started really, you know, going over
16 to Mental Health and stuff, I think, that I started
17 speaking to her.

18 Q. During any of your conversations
19 with her, did you express any concerns that he may
20 attempt suicide again?

21 A. I don't remember if it was with
22 her or Hal Meyers, but I was always worried about
23 him, yes.

24 Q. Did he ever express to you that
25 he was going to try to attempt suicide again, and

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2 that's why you were concerned?

3 A. No -- no. It was just his frame
4 of mind, always, you know, just -- just, you know,
5 crying and I can't take this anymore, just coming
6 from his own actions to me. But he never came out
7 and said he was going to do that again.

8 Q. Do you remember any of the sum
9 and substance of any conversations you had with Ms.
10 Palladino?

11 A. Honestly, I don't.

12 Q. Okay. What about any
13 conversations with her about medications that your
14 husband was on?

15 A. I might have asked -- see, again,
16 I don't remember if it was her or if it was Hal
17 Meyers -- my gosh, why didn't I just like write a
18 book, so I could answer everything. If I did, it
19 would have been -- I don't know. I'm sorry.

20 Q. It's okay. Do you recall any
21 conversations where you suggested that he be put on
22 certain medications, or taken off certain
23 medications?

24 A. No; I would never say take him
25 off or put him on. I mean, I don't -- I don't know

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2 what he should be on and what he shouldn't be on. I
3 just know that he shouldn't be -- that you should be
4 weaned off them and not off them cold turkey.

5 Q. Now, your complaint indicates
6 that in the -- in the two weeks prior to his death,
7 Ms. Palladino and Mr. Meyers determined that he
8 should stop taking prescribed medications. Do you
9 know anything about that allegation?

10 A. There was times where he was
11 taken off his medications.

12 Q. Okay.

13 A. And from what I understand, it
14 was just cold turkey. I know -- and I know his
15 autopsy report, at least from what I read, showed he
16 had nothing in his system. Maybe I'm wrong, but
17 shouldn't he have had something in his system? Would
18 that show?

19 Q. Let me ask you this. So you said
20 that there was times where he was taken off
21 medications. Can you tell me when that happened?

22 A. No. Just over time, different
23 times, I don't know dates. And I don't know if it
24 was because he wanted to be off them and wanted to be
25 out of mental health because it wasn't a very

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2 pleasant place in mental health or what, but either
3 way, regardless of whether -- see, I don't know,
4 because I'm not the doctor.

5 In my eyes, regardless of whether he
6 wants to be on them or not, I mean, you don't take
7 him off that or at least you wean him off it. I
8 mean, you take the medicine in front of a nurse and
9 they check your mouth and stuff. I'm not saying
10 people can't get by you, but just cold turkey, I was
11 always told you just don't -- regardless of what
12 happened, you just -- you can't go cold turkey off
13 depression medications.

14 Q. How do you know he was taken off,
15 cold turkey, versus weaned off of medications?

16 A. Because he told me.

17 Q. Did he ever tell you that he was
18 refusing to take any of his medications?

19 A. I think there was times where he
20 -- refusing, no. But -- but he told me he didn't
21 want it to -- yeah, like he didn't want to take them
22 anymore. But as far as you mean, like a nurse trying
23 to give it to him, and he refuses?

24 Q. Right.

25 A. If he did, I don't remember. I

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2 don't remember that. I'm sure there is things I

3 don't know.

4 Q. Do you recall him discussing with

5 you doctors telling him that they couldn't give him

6 medications because he was taking Suboxone?

7 A. I do remember that at some point,

8 yes, because they couldn't interact?

9 Q. He told you that that happened?

10 A. I believe so, at one point, he

11 did.

12 Q. When did he tell you that?

13 A. I don't remember.

14 Q. Did he tell you why he wasn't

15 allowed to take his psychiatric medications because

16 of the Suboxone?

17 A. He either told me or it was just

18 common sense to me that they would interact. I mean,

19 that you can't take those and take -- well, isn't

20 Suboxone -- doesn't that try to wean you -- I'm not

21 sure. I'm not familiar with Suboxone. My

22 understanding is that they give it to people when

23 they're trying to come off of drugs. I don't know.

24 Q. Well, you don't have any medical

25 training; correct?

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2 A. No.

3 Q. Okay. And you don't have any
4 medical degrees or training or you didn't take --

5 A. No.

6 Q. -- any classes; correct?

7 A. Correct, I don't have any medical
8 training.

9 Q. Anything else you can recall
10 about conversations with Jami Palladino about her
11 treatment of your husband?

12 A. I didn't talk to her often. I
13 mostly talked to Hal Meyers. I don't -- we didn't
14 speak very long.

15 Q. Do you have any basis to believe
16 that she was responsible for taking your husband off
17 of any medications?

18 A. No, I don't know who is the one
19 who takes them off and don't take them off, so.

20 Q. Do you have any allegations with
21 respect to her mental health treatment of your
22 husband?

23 A. She's just the social worker;
24 correct? Right, so she --.

25 Q. Go ahead.

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2 A. So I'm not sure what other roles
3 she has. I just took it as she just is like, kind of
4 like a counselor checks in on things every once in a
5 while. I mean I'm not sure what her role other than
6 that is.

7 Q. Okay. I was just trying to get a
8 sense from your perspective, what your allegations
9 against Ms. Palladino specifically are. If you have
10 any idea as to what you're alleging against her,
11 specifically?

12 A. Against her specifically, alone,
13 none.

14 Q. Okay. So you don't have any
15 critiques as to her mental health treatment of your
16 husband?

17 A. I don't know exactly what her
18 role was, other than -- I mean, did I really get any
19 answers from her, no. It was just, you know, common
20 sense, basic conversation, but I didn't speak to her
21 that much.

22 Q. Okay.

23 A. I only spoke to her a few times.

24 Q. Do you believe that she played
25 any role in your husband's death?

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2 A. No.

3 Q. What about Mr. Meyers? You --

4 you referred to Hal Meyers before and I think you

5 said that you -- you did speak with him?

6 Q. Yes.

7 Q. How many times did --?

8 A. Yes, I had to go straight to him

9 because I didn't get any answers.

10 Q. How many times did you speak with

11 him?

12 A. At least five.

13 Q. Do you recall when that was?

14 A. Yes. Mostly, it was after this -

15 - whenever he got involved with Mental Health.

16 Whenever he had to go over to Mental Health, that's

17 when I mostly spoke to him because -- I can't

18 remember, but I don't think he could make phone calls

19 home when he's in Mental Health. So I had to speak

20 to someone.

21 So whenever he was actually over in

22 the Mental Health Unit is when I would speak to him -

23 - you know, I'd speak to him about that, or I would

24 call him like if I was worried. I was always calling

25 and checking up. And that's what he told me that he

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2 just wasn't adjusting like other inmates would adjust
3 by now, social adjustment disorder.

4 Q. Again, same questions that I
5 asked you about Mrs. -- Ms. Palladino. Did you ever
6 tell Mr. Meyers that you were concerned that he would
7 try to attempt suicide again?

8 A. I told -- if I did, I don't
9 remember that. But I told Mr. Meyers that I was
10 worried about him and that he -- the way he is and
11 everything and that he's so upset. And I do remember
12 how Meyers telling me that he's so dependent on his
13 family that sometimes, and not these exact words, but
14 you got to kind of like give him tough love.

15 Q. Do you remember when he told you
16 that?

17 A. No. If I ever -- if I would have
18 ever remembered I had -- I would have to like take
19 dates and like know all this, I would've had a
20 notebook out.

21 Q. Okay. What about any
22 correspondence, did you ever send Mr. Meyers any
23 letters? Did he ever send you anything?

24 A. No.

25 Q. Did you ever --?

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2 A. Just phone calls.

3 Q. Okay. Did you ever send any
4 correspondence, any documents or letters or anything
5 to anybody at Department of Corrections or O.M.H.?

6 A. No.

7 Q. Can you recall anything else
8 about the sum and substance of your conversations
9 with Mr. Meyers?

10 A. I mean, I told Mr. Meyers that I
11 just, you know, have been trying to do everything I
12 could possibly do on my end, and I was worried about
13 him when he was over in Mental Health and how he was
14 getting treated. And he reassured me, of course,
15 that he was not getting treated the way that I
16 understood.

17 Just -- just like a mother worrying
18 about a child, those were our conversations.

19 Q. You said that he reassured you
20 your husband was not getting treated the way you
21 understood.

22 A. Yes, because I brought up
23 concerns, like I would say, like, well, you know,
24 there's a C.O. over there, a bigger guy who they
25 refer to as Santa Claus, you know, is treating him

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2 this way or this way. Well, he's in Mental Health.

3 And I understand they're still prisoners, but I mean,

4 it's mental health, he's there for a reason and there

5 is certain things that he may not be able to function

6 like your typical inmate in general population.

7 And I brought up my concerns. And he

8 just -- he just said, you know, he's unaware of that.

9 And he -- you know, that -- of course, they're going
10 to say that. Or he was unaware of it. I don't know.

11 I mean, he's only there so many hours
12 a day. He's not there overnight.

13 Q. Did either you or your husband
14 ever file any complaints against any correctional
15 officers?

16 A. I never had.

17 Q. Do you know if your husband ever
18 did?

19 A. I don't know. I don't know if he
20 did. Or I don't remember if he did. He was always
21 scared. He was always scared of what was going to
22 happen if he told.

23 Q. Did he tell you the basis for his
24 fear?

25 A. Yes, because he doesn't want to

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2 be put in the box, of losing privileges that you're
3 not supposed to lose, like maybe not getting to use
4 the phone, or just scared of the way some of the
5 officers were doing things that you're not supposed
6 to do. The officers, I'm speaking of.

7 Q. Other than the officer that they
8 referred to as Santa Claus, did he tell you any other
9 names of the officers he was talking about being
10 afraid of?

11 A. No. Over mental -- this was over
12 in Mental Health.

13 Q. Uh-huh.

14 A. No. I do remember a time where
15 he was having bad back pains. I can't remember if he
16 fell or what. And two of the correction officers
17 threatened him, like, yeah, we better not have to
18 bring you to the hospital or whatever. And -- and he
19 did end up having to going in to the hospital and
20 they weren't happy. I don't know their names.

21 They were none that I've ever seen on
22 weekends. You know, and even if I did try to see a
23 name, their safety pins are so -- their name tags are
24 so skinny and tiny, I couldn't read them.

25 Q. You said your husband had to go

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2 to the hospital after he fell?

3 A. Something like that, yes.

4 Q. When was that?

5 A. It was after 2016, but I don't
6 know the exact date.

7 Q. Do you know why he fell?

8 A. I don't. I don't -- he was
9 walking, so I don't know. I don't -- honestly, I
10 don't remember. I don't know if it was winter or if
11 it's just his back, I don't know. It wasn't like a
12 major incident, from what I hear.

13 Q. But he went to an outside
14 hospital for --

15 A. Yes.

16 Q. -- those complaints?

17 A. Yes.

18 Q. With respect to your
19 conversations with Mr. Meyers, did you ever discuss
20 your husband's medications with him?

21 A. Yes, about being on and off them.

22 Q. Can you tell me about those
23 conversations?

24 A. Yes. And he did tell me, at one
25 point they took him off it because of the Suboxone.

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2 Q. Did you ask -- well, strike that.

3 Anything else you can remember about

4 your conversations with Mr. Meyers about either

5 putting your husband on medications or taking him off

6 medications?

7 A. It was -- I don't think it was

8 ever about putting him on medications because I feel

9 he should have stayed on medications, but taking him

10 off because -- especially cold turkey.

11 Q. Do you know -- you -- you've said

12 before that he was taken off these medications, cold

13 turkey. Do you know when he was taken off

14 medications?

15 A. No. But I know he -- from my

16 knowledge, he was not on any before he committed

17 suicide.

18 Q. Do you know why he wasn't on any

19 medications before he committed suicide?

20 A. No; I was just told he was taken

21 off them.

22 Q. You were told by who that he was

23 taken off?

24 A. Him, by my husband.

25 Q. Okay.

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2 A. You know, there was times when I
3 didn't speak to him. There was times where I just --
4 I don't know -- so many years and so many
5 conversations.

6 Q. Right. So I'm going to take you
7 to the year 2018. And I think you said earlier that
8 you used to visit your husband every weekend.

9 A. Yes.

10 Q. Is that true for 2018, as well?

11 A. It was ever since when he was in
12 Downstate, when he was in Essex County Jail, and when
13 he was in Franklin Correctional Facility, yes.

14 Q. So November 2018, did you visit
15 him on the weekends leading up to his death?

16 A. Yes.

17 Q. What about your children? Did
18 they visit him, as well?

19 A. Yes.

20 Q. How often would you say they
21 visited him in that last year?

22 A. My daughter more than my son,
23 just because my son was a teenager and he had sports
24 and he had things going on, but more than probably
25 most kids visited their parents in prison.

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2 Q. And you said that you spoke to
3 your husband on the phone, frequently?

4 A. Yes, all the time. I couldn't
5 even get through a grocery line without him calling.

6 Q. That was before November 2018?

7 A. Yes -- yes. I was there the
8 weekend before he committed suicide.

9 Q. How long was that visit, that
10 weekend before he committed suicide?

11 A. We've always stayed all day, like
12 the whole time, got there early and stayed -- I mean,
13 once in a while, we'd leave an hour early, but
14 otherwise, we were there the whole day.

15 Q. At any point during that visit
16 with him, the weekend before, did he indicate that he
17 wanted to hurt himself or attempt suicide?

18 A. No.

19 Q. What was his general demeanor
20 like at that visit?

21 A. He was always -- he was always --
22 the visits were always him sad and don't want to be
23 in there, and I feel like I'm never going to come
24 home. That's what the visits were pretty much always
25 like.

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2 Q. Uh-huh.

3 A. It was always me trying to keep
4 him -- keep him going.

5 Q. Was that true since you first
6 started visiting him, back in 2013?

7 A. No. It really got worse in Mid-
8 State. That's when it -- I mean, was he still upset
9 and -- yeah, in Franklin, but it wasn't until Mid-
10 State when it was all -- just got worse.

11 Q. Okay. So that was since 2015, he
12 began acting that way?

13 A. Whenever he -- whenever he first
14 started getting into Mid-State, after he was there
15 for a bit, that's when it really --

16 Q. Okay.

17 A. -- went downhill.

18 Q. Did you speak to your husband on
19 the phone the day before he committed suicide?

20 A. I'm sure I did, yes.

21 Q. Do you recall any sum and
22 substance of those conversations?

23 A. I think I wasn't sure if I was
24 going to be there that weekend, but I was going to
25 try to get there. I was trying to give him -- I

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2 tried everything. There would be -- I tried the
3 tough love thing, but most of the time I walked
4 around eggshells because I wanted him to come home
5 and I was trying to get him through it every day,
6 every day. Instead of trying to get myself through
7 anything, I was always trying to just get him through
8 it.

9 I mean, I'm not going to lie. There
10 was times where I told him straight out that that is
11 it, you need to get it together or, you know, I'm
12 leaving or I'm not going to be here, I'm just, get it
13 together because I was, like, I didn't know what else
14 to do at times.

15 I mean, day after day after day, and
16 like Hal Meyers told me before, you know, he's so
17 dependent on your -- on the family, which that's what
18 I wanted. I mean, we wanted to be there for him. He
19 said, sometimes you got to hit the tough lot. So I
20 had to go back and forth, but the majority of that
21 time it was -- it was not doing that.

22 Q. So at any point during your
23 conversations with him, the day before, did he say
24 anything about hurting himself or wanting to commit
25 suicide?

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2 A. No.

3 Q. If he had said anything like
4 that, what would you have done?

5 A. I would have called -- I would
6 have told him that I'm calling Mental Health -- or
7 maybe I shouldn't tell him because he'd be like no,
8 no, no, I'm not really going to do that, I'm not
9 going to do that, you know, I'm just upset. But I
10 would have. I would have called somebody so they
11 could put them on suicide watch if they did that.

12 Q. Do you know if any of your
13 children spoke to him the day before?

14 A. I don't remember. If they were
15 home, they would have because when I was done
16 talking, they would get on the phone. We all always
17 talked. And my son's -- my son's musically talented,
18 so he'd play music for him, or just anything.
19 Anything to keep him connected to home.

20 Q. Do you know if he spoke to your
21 kids at all about wanting to hurt himself or wanting
22 to commit suicide?

23 A. Not about wanting -- as far as I
24 know, not about wanting to commit suicide, but he did
25 the same thing to them. He'd put worries on him,

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2 like I can't take this and stuff, stuff they should
3 not hear.

4 Q. Do you know if he said those
5 things because you talked to them about it or because
6 he told you he said that to them?

7 A. They told me.

8 Q. Okay. Now, up -- up to that
9 point, did you undergo any mental health counseling?
10 By up to that point, I mean November 2018.

11 A. Not counseling, no. I just --
12 I'm still -- I mean, I -- my regular doctor and being
13 on medication, yes.

14 Q. Okay.

15 A. Just work, work, work.

16 Q. Because while your husband was in
17 prison, you were obviously the sole breadwinner for -
18 - for you and your family? Is that -- is that a yes
19 or --?

20 A. Yes. I'm sorry.

21 Q. And if you -- if you want to take
22 a break at any point --

23 A. No.

24 Q. -- we can take a break.

25 A. Sorry, I didn't mean to cut you

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2 off. I don't want to take a break. I just want to
3 keep going.

4 Q. Okay. So up to November 2018,
5 you had seen your primary care doctor about some
6 mental health conditions --

7 A. Yes.

8 Q. -- or mental health concerns for
9 yourself?

10 A. Yeah, yes.

11 Q. Were you ever diagnosed with any
12 mental health conditions up to that point?

13 A. Just anxiety and depression.

14 Q. Were you on any medications for
15 those conditions?

16 A. Yes.

17 Q. What medications were you put on?

18 A. Citalopram.

19 Q. Do you remember when you were
20 prescribed that medication?

21 A. Oh, before that event. I've been
22 on it for years.

23 Q. Okay. Before when, you mean?

24 A. Before he committed suicide.

25 Q. Okay. So you've been on -- I'm

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2 sorry -- what was it?

3 A. Citalopram, I think it's generic

4 for -- it might be generic for Celexa.

5 Q. Okay. Do you remember when you

6 were put on the medication? Was it after your

7 husband went to prison?

8 A. Yes. Not right after, because I

9 didn't know whether I was coming or going or what was

10 going on, or nothing really sunk in. It was -- but

11 yes, after.

12 Q. All right. Any other medications

13 you were put on prior to his death?

14 A. No.

15 Q. That primary care --?

16 A. Well, I mean high blood pressure

17 medication, but nothing related to mental health.

18 Q. Okay. When were you put on the

19 high blood pressure medication?

20 A. I don't remember.

21 Q. Your primary care doctor, what

22 was that person's name?

23 A. When I was living up there, it

24 was Robert Berrick, same -- same place, Ticonderoga

25 Health Center.

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2 Q. Was he the one that prescribed
3 you the Celexa?

4 A. Yes.

5 Q. Did you ever have any mental
6 health counseling? Did you ever see any therapist or
7 psychologist or anything like that prior to his
8 death?

9 A. When he first went away and
10 everything, I started to, and the guy just -- I
11 didn't really want to continue with him. It was a
12 small town and he started asking me questions about
13 his lawyer and everything. And from that day on, I
14 was like, no, I don't think so, not going back to
15 him, because that's not why I'm here.

16 He was asking me about his case and
17 his lawyer because he knew -- he knew of his lawyer.
18 I know the D.A. went to school with him, too, small
19 town.

20 Q. How many times did you see that
21 particular therapist?

22 A. Maybe twice. It was right at the
23 health center.

24 Q. At the Ticonderoga Health Center?

25 A. Yes.

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2 Q. As of November 15th, 2016 --

3 2018, sorry -- so that was the day before your

4 husband's death, were you and your husband separated

5 at that time?

6 A. No.

7 Q. Were -- were you dating other

8 people?

9 A. No.

10 Q. Did you speak to your husband on

11 the phone, the day before, about dating somebody

12 else?

13 A. Not about dating someone else,

14 but I told him that I was talking to someone.

15 Q. Okay.

16 A. I was trying to get him -- which

17 did not work, I was just trying to get him to get it

18 together and get home.

19 Q. Did you -- did you indicate to

20 him that you were interested in this other person?

21 A. Not interested, but that I was

22 friends and talked to him.

23 Q. Was your husband concerned about

24 this other person and you spending time with him?

25 A. Yes.

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2 Q. What did he say --?

3 A. But I really didn't spend time
4 with anyone. I mean, I have friends. I had friends,
5 but all I did is just work and go see him, work and
6 go see him, right up until that day.

7 Q. This -- this other person that
8 you were referring to, that you were talking to I
9 guess, what was that person's name?

10 A. It's -- it's Martin, my current
11 boyfriend which was not my -- which I was not seeing
12 then, but --.

13 Q. Okay. And -- and your husband,
14 at the time he expressed that he was concerned about
15 maybe you having a relationship with this other
16 person, Martin?

17 A. He was just -- he just didn't
18 want me to leave him, but I wasn't going anywhere.
19 That's what he would express. But he's -- he's
20 always did that. The inmates in there would always
21 say, oh, yeah, your wife's going to leave. And they
22 were always talking like that. And he believes
23 anything.

24 And you know, even before, you wait,
25 you're in here long enough, your -- your wife is

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2 going to leave, just because theirs do. You know,
3 they would always -- he would always tell me that
4 kind of stuff.

5 Q. Up to that point, had you ever
6 spoken to a divorce attorney?

7 A. No.

8 Q. Did you ever speak to anybody
9 about possibly divorcing your husband?

10 A. No.

11 Q. Did you tell your husband that
12 you were thinking of leaving him or thinking of
13 getting a divorce?

14 A. No.

15 Q. But it was his impression that it
16 was possible that -- that you would leave him?

17 A. That's what he was afraid of.
18 But I didn't -- I never said I was divorcing him or
19 that I was dating someone or anything to that matter.

20 Q. Did you ever discuss divorce
21 papers with him?

22 A. No -- no.

23 Q. Had your husband been released
24 from prison, eventually, whether on parole or whether
25 he served out his full sentence, did you have any

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2 intention to divorce him?

3 A. No.

4 Q. You said that you're currently in
5 a relationship with -- I think you said Martin?

6 A. Yes.

7 Q. And is that the only relationship
8 that you've had since your husband's death?

9 A. Yes.

10 Q. When were you officially in a
11 relationship with this person?

12 A. Maybe 2020, the end of 2019.

13 Q. And I think you said that you --
14 you're currently living with him now?

15 A. Yes.

16 Q. When did he first start living
17 with you?

18 A. Maybe August 2019.

19 Q. I'm going to talk a little bit
20 about your husband's death. So if you want to take a
21 break, that's totally fine. I just have a few
22 questions about it. Okay?

23 A. Okay.

24 Q. How did you become aware that
25 your husband had died?

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2 A. That morning, it was a Friday,

3 and I worked at a school and it was a snow day, so I

4 was home. The phone rang before seven o'clock, and

5 it said Mid-State Correction Facility, which I

6 thought was weird, because the inmates can't use the

7 phone until seven o'clock. But, you know, didn't

8 really -- I was like, okay, maybe something's screwed

9 up.

10 Then the phone rang again and it was -

11 - someone told me I'm sorry that your husband passed

12 away, but didn't give me any details, just kept

13 referring me to the pastor or the reverend or

14 somebody there. And that was that.

15 So of course, I get on the phone and

16 try to call around and stuff, but nobody would give

17 me information or details. Nothing. I got nothing.

18 So I think a pastor, somebody did call me. And I

19 still didn't have details.

20 And then later on in the day, I

21 believe it was later on in the day, maybe a State

22 Trooper or somebody from -- a lady from Marcy --

23 Marcy, maybe it was their State Police or somebody,

24 called me and told me -- told me I'm sorry, you know,

25 I -- I know you were -- I had heard that you're

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2 trying to find out details of your husband's death,
3 and this is what happened. That was it.

4 Q. Do you know who the -- the first
5 person was who called you from Mid-State?

6 A. Nope.

7 Q. Okay.

8 A. It was a man, and I don't know.

9 Q. Did you ever speak to anybody in
10 DOCCS or O.M.H. about your husband's death?

11 A. No. After he died, that was it.
12 I mean, I didn't even get his stuff back. I did --
13 they referred me to a lady who takes care of that.
14 I'm sure I have a piece of paper somewheres with her
15 name on it. And she told me that -- I mean,
16 obviously, whatever he had, the inmates are going to
17 steal.

18 But I didn't want all the pictures of
19 -- we always sent pictures of myself and the kids --
20 just floating around in the correctional facility.
21 So I at least wanted that back. And she told me they
22 were going to mail it out to me. And then I never
23 heard from -- never heard from them again. I did not
24 get -- every time I called, I was just referred to
25 speak -- I can speak to the pastor. So no, never

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2 again.

3 Q. So you never get any of his
4 belongings or anything like that?

5 A. Nothing. Nope.

6 Q. While your husband was in prison,
7 did you send him letters?

8 A. Yeah -- yes.

9 Q. Did you keep any copies of those
10 letters?

11 A. I may have some somewheres. I'd
12 have to look.

13 Q. And what about, did your husband
14 send you letters?

15 A. Yes.

16 Q. Did you keep copies of those
17 letters?

18 A. I think I might have some.

19 Q. If you have some, if you could
20 track those down, maybe, and -- and give them to your
21 attorney.

22 A. Yes.

23 Q. That would be great.

24 A. Yes.

25 Q. Did you write, anybody else at

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2 that facility, any letters other than your husband?

3 A. No -- no.

4 Q. Did you ever speak to any other

5 inmates who were in the prison at the same time as

6 your husband at the time of his death?

7 A. No.

8 Q. Now, I'm going to talk to you a

9 little bit about some of the damages that you are

10 requesting as a result of your lawsuit, one of which

11 is funeral expenses. What were the funeral

12 arrangements for your husband?

13 A. He was cremated.

14 Q. Okay.

15 A. So he was cremated and then we

16 had just a little service at the cemetery up near his

17 family. And we just had to order, online, just like

18 a plaque. We never got to get like an actual stone

19 or anything. So he's actually in the same spot with

20 his parents.

21 Q. Who paid for the funeral

22 arrangements and the funeral expenses?

23 A. Myself and his sister, of which I

24 told her I'd pay her back.

25 Q. How much did his sister pay for

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2 these arrangements?

3 A. The whole total was twenty-five
4 hundred dollars, but that's another thing I'll have
5 to get from her because I don't remember how much she
6 -- she paid more than I did. I don't remember, but
7 it was -- it was with the arrangement of me paying
8 her back.

9 Q. Did you ever pay her back?

10 A. Not yet, I didn't give her the
11 whole thing, no.

12 Q. What about any other expenses
13 that you're claiming? Are you familiar with any
14 other expenses that you're claiming for this -- for
15 this case?

16 A. Just -- just like for the stress
17 that the kids and I went through.

18 Q. Okay. I'll -- I'll get into that
19 in a second, but I -- I'm just taking about straight-
20 up expenses like funeral arrangements, medical bills,
21 anything like that?

22 A. The funeral arrangements.

23 Q. Okay.

24 A. I don't think there are any
25 medical bills. If there are, then I don't have them.

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2 I know that -- that I didn't have to pay to have him

3 brought home.

4 Q. Okay. Other than funeral
5 expenses, any other expenses you can think of?

6 A. I can't think of.

7 Q. Okay. You did mention some
8 psychological damages, I think, that you're claiming.
9 And we talked a little bit about the mental health
10 care that you received prior to his death.

11 A. Right.

12 Q. You mentioned you were on Celexa
13 because of your treatment at Ticonderoga Health
14 Center.

15 A. Uh-huh. And I'm still on it, but
16 I have -- since I live here now, I have a different
17 doctor.

18 Q. Okay. That was my next question.
19 You -- you're still on the Celexa now?

20 A. Yes.

21 Q. What -- what's your dosage of the
22 Celexa?

23 A. I think it's -- now, it's just
24 twenty. I think it's twenty milligrams or twenty-
25 five milligrams.

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2 Q. At any point, was it more than
3 twenty or twenty-five milligrams?

4 A. No, because I was too scared to
5 take -- they tried to get me higher dosages, but
6 after everything he went through with his
7 medications, I was too scared to take them.

8 Q. When did they try to give you
9 higher dosages?

10 A. When I first started getting on
11 them.

12 Q. Okay. So back in 2016, 2015?

13 A. Yeah, just an estimate, yes.

14 Q. Okay. Other than the Celexa, are
15 you on any other medications now?

16 A. Just the high blood pressure
17 medication.

18 Q. Okay. And since your husband's
19 death, have you treated with any other mental health
20 care professionals other than your primary care
21 doctor?

22 A. No.

23 Q. Are you claiming any lost wages
24 on behalf of your husband?

25 A. It would just have been the

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2 beginning, you know, when it all first happened, but
3 no.

4 Q. What do you mean by the beginning
5 when it all first happened?

6 A. I mean, of course, I had to miss
7 work when he passed away and I had to -- but there's
8 nothing that really stands out.

9 Q. Okay. And then you mentioned
10 stress on your kids?

11 A. Oh, yeah.

12 Q. Have your kids -- have your kids
13 been to see any mental health care professionals
14 since his death?

15 A. They go through their doctor. My
16 son was actually diagnosed with P.S.T.D.

17 Q. Okay. And -- and you said they
18 go through their doctor. Who's their doctor?

19 A. My son goes to Community Care.
20 They both go to Community Care physicians, and -- I
21 think my daughter goes there. My son goes to
22 Community Care Physicians, in Clifton Park, New York.
23 I can get you his doctor's name or I can give it to -
24 -.

25 Q. Okay. And prior to your

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2 husband's death, did your son have any mental health
3 treatment?

4 A. Yeah, they were -- they were both
5 on medication.

6 Q. Okay. Both your son and your
7 daughter?

8 A. Yeah. Yes.

9 Q. And this was prior to your
10 husband's death?

11 A. Yes. And after, yeah -- yes.

12 Q. Okay. What medications were your
13 kids on prior to his death?

14 A. My daughter is on sertraline or -
15 - starts with S, sertraline. My son's was changed.
16 I don't know what he was on before, but he has --
17 right now he's on citalopram. He has stuff to help
18 him sleep. I can get a list.

19 Q. Okay. What about this -- were
20 they -- were they actually diagnosed with any mental
21 health conditions prior to your husband's death?

22 A. Just depression and anxiety. My
23 daughter gets panic attacks, but the panic attacks
24 are more after.

25 Q. Okay.

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2 A. And my son's P.S.T.D was after
3 they diagnosed him.

4 Q. The depression and anxiety that
5 your kids were diagnosed with prior to your husband's
6 death, was that as a result of your husband going to
7 prison?

8 A. Yeah. Yes. It was never before.

9 Q. Did it have anything to do with
10 anything else that happened in their lives, other
11 than your husband going to prison?

12 A. No.

13 Q. And you said your son was just
14 recently diagnosed with P.T.S.D.?

15 A. Yes, like this past year. Might
16 have been two years by now. I -- but yeah, fairly
17 new.

18 Q. Do you know why he was diagnosed
19 with that disorder?

20 A. Just he is -- I mean, I wasn't
21 there with him, but just his nerves and depression
22 and his shakiness. And I'm not sure how they, you
23 know, diagnose you with that, but not sleeping. They
24 both have nightmares.

25 Q. Do you know if the P.T.S.D.

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2 diagnosis is related to your husband's death?

3 A. Yes. Yes, because he spoke with

4 his doctor about it.

5 Q. Have you ever done any family

6 counseling with your daughter or your son?

7 A. No. That was on our mind, but we

8 just haven't but my son has brought that up and I

9 have researched different counselors, and our

10 insurance is limited to who we see.

11 Q. Okay. Obviously, you were

12 appointed as the administrator of your husband's

13 estate; correct?

14 A. Yes.

15 Q. Has anybody challenged that in

16 court? Has anybody challenged your status as the

17 administrator?

18 A. No.

19 Q. Did you husband have a will?

20 A. No.

21 Q. Did he have any debts when he

22 died?

23 A. He had some -- well, I didn't

24 receive anything after he died, but after he went

25 away, he had some credit card debts, and he had a

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2 student loan. But then I never received anything
3 after -- after.

4 Q. Okay.

5 A. Like I -- I had -- after he went
6 away, I had called everyone and told them that he was
7 away.

8 Q. Did your husband have any life
9 insurance policies?

10 A. He had one that I didn't know
11 about at the time, that his dad had taken out on him,
12 which I didn't even know until he passed away, when
13 he was younger. And I think it was like a thousand
14 dollars, but I do have the paper.

15 Q. Okay.

16 A. It was a small one.

17 Q. So with respect to your husband's
18 estate, do you have any sense of how much it's worth?

19 A. I don't. I just know as far as
20 the pain and everything, that my -- that's my main
21 focus. I mean, you know, I -- I know everybody goes
22 through pain, but I just wish I could switch spots
23 with -- I don't mean this rudely, but I wish I can
24 just switch spots with any of you so you can,
25 especially my kids, you know, get how that feels.

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2 It's just my stomach tightens up. I

3 mean, you know, I'm -- I'm actually getting

4 frustrated and -- and just what we went through is

5 just -- just ridiculous.

6 Q. How would you describe the
7 relationship between your husband and your daughter
8 right before his death, so 2018?

9 A. Good. Very good. I mean, she
10 did the same thing. All that responsibility
11 shouldn't be on kids, but you know, just always there
12 for him, you know, keep on going, to be positive.
13 You know, if he talked about what went on in there,
14 she always tried to keep it positive for him. They
15 had a good relationship.

16 And it wasn't easy for her with him
17 being in there and her background being criminal
18 justice. You know, it had its ups and downs.

19 Q. Did your daughter hold any sort
20 of resentment or anything because your -- your
21 husband was in prison?

22 A. No. No. I mean, I think, you
23 know, we had our moments where it was like -- you
24 know, she had her moments to where she would try to
25 be like, okay, dad, you just got to get through this,

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2 you know, you put your -- you're here, now deal with
3 it. But the majority of the -- majority was just to
4 be positive and keep him -- the goal was to get him
5 home.

6 Q. What about the relationship
7 between your husband and your son, can you describe
8 that to me?

9 A. They had -- they had a good
10 relationship, too. Of course, my son was young and
11 busy with his friends, so he didn't see him as often
12 or talk to him as often as we did. But he at least
13 talked to him once a day, but they had a good
14 relationship.

15 Q. Uh-huh.

16 A. We all had the same goal, to try
17 to get him home.

18 Q. So this -- this is going to be
19 kind of a broad question and --

20 A. Yeah.

21 Q. -- I apologize, but your amended
22 compliant indicates that your husband didn't receive
23 the necessary care for his mental health needs. Can
24 you tell me what additional or further care that --
25 that you allege he should have received?

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2 A. Further care? Well, I mean,
3 considering his state of mind that everybody could
4 clearly see in there, I feel he should've been
5 watched more closely and -- and -- watched more
6 closely, definitely.

7 If they had to take him off his
8 medication, regardless of what it was for, don't send
9 him back out in general population. Watch him.
10 Watch him for that period of time because now you're
11 going -- and no, I'm not a medical expert, but now
12 you're going cold turkey. When you already have
13 mental health issues and you've been taken off of
14 medication, regardless of what it's from, I mean, I
15 would think that would screw your mind right up right
16 there.

17 I -- I just feel like he should've
18 been watched more. I mean, everybody sees it.
19 Everybody knows. I mean, everybody knows everything
20 in there. I just --.

21 Q. Who -- go ahead.

22 A. No, you go ahead.

23 Q. Okay. I was just going say who
24 do you allege should've watched him more closely?

25 A. Well, I mean, was there any

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1 Estate/of King, et al v Annucci, et al - 3-18-22 - Amy King
2 communication between Mental Health and, you know,
3 the corrections officers? So say, for instance, you
4 know, he's going through that, even though he got put
5 back in general population, if he's having a -- if
6 he's having a hard time, which clearly you can see he
7 was, well then, why wouldn't they -- and I -- I
8 understand there's a lot of inmates and only so many
9 C.O.s. But if supposedly there, you know, inmates
10 seen him upset or he was, you know, having a hard
11 time or they knew he goes back and forth to Mental
12 Health, well, then maybe whoever's on watch in his
13 section should have more of a watch on him.

14 Q. Anything else you're alleging
15 with respect to further monitoring or further care he
16 should have received?

17 A. I just believe he just -- as far
18 as mental health goes, that he just wasn't getting
19 the care he should get in prison, considering that he
20 had a suicide attempt before.

21 MS. COWAN: I'm going to look over my
22 notes. Do we want to take like a quick break, like
23 two, three minutes, or something? Is that okay?

24 THE WITNESS: Yeah, whatever you have
25 to do.

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2 MS. NAPPI: I would appreciate it if

3 we could take ten minutes if it's all right.

4 MS. COWAN: Yeah, that's fine.

5 MS. NAPPI: Okay. Thank you so much.

6 (Off the record, 12:02 p.m.)

7 (The deposition resumed, 12:12 p.m.)

8 THE REPORTER: Okay. We're back on

9 the record.

10 MS. COWAN: I have no further

11 questions. So unless your attorney has any questions

12 for you, I'm -- I'm all set for today.

13 MS. NAPPI: I have no questions.

14 THE WITNESS: Okay. I apologize if I

15 seemed frustrated. It's not towards anyone. It's

16 just everything inside me, and not remembering dates,

17 I'm like who would have ever thought I had to

18 remember everything.

19 MS. COWAN: Not a problem.

20 MS. NAPPI: I have no further

21 questions.

22 MS. COWAN: All set?

23 THE REPORTER: Okay. Let -- let me --

24 MS. COWAN: Okay.

25 THE REPORTER: -- let me take us off

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1 Estate/of King, et al v Annucci, et al - 3-18-22 - Amy King
2 the record.

3 (The deposition concluded, 12:13 p.m.)

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1 Estate/of King, et al v Annucci, et al - 3-18-22 - Amy King

2 STATE OF)
3 COUNTY OF)

4

5 I, AMY KING, have read the foregoing record of
6 my testimony taken at the time and place noted in the
7 heading hereof and do hereby acknowledge:

8 (Please check one)

9 () That it is a true and correct transcript of
10 same.

11 () With the exceptions noted in the attached
12 errata sheet, it is a true and correct transcript of same.

13

14 X
15 AMY KING

16

17 Sworn to before me this
18 _____ day of _____, 2022.

19 X _____
20 NOTARY PUBLIC
21 My Commission Expires:
22 _____

23

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1 Estate/of King, et al v Annucci, et al - 3-18-22 - Amy King

2 I, HOWARD HUBBARD, do hereby certify that the

3 foregoing testimony of AMY KING was taken by me, in the

4 cause, at the time and place, and in the presence of

5 counsel, as stated in the caption hereto, at Page 1

6 hereof; that before giving testimony said witness was

7 duly sworn to testify the truth, the whole truth and

8 nothing but the truth; that the foregoing typewritten

9 transcription, consisting of pages number 1 to 106,

10 inclusive, is a true record prepared by me and completed

11 by Associated Reporters Int'l., Inc. from materials

12 provided by me.

13

14 HOWARD HUBBARD, Reporter

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1 Estate/of King, et al v Annucci, et al - 3-18-22 - Amy King

2 ASSOCIATED REPORTERS INTERNATIONAL, INC.
3 (800) 523-7887

4 Date:

5 Case Name: Estate of Joseph King, et al v Annucci, et al
6 Index Number: 9:20-CV-1413

7 Deponent: Amy King

8 Deposition Date: 3/18/2022

9 Examining Attorney: Aimee Cowan

10 Dear Ms. King:

11 Please read and make any changes and/or corrections in
12 your testimony and sign the transcript in the presence of

13 a notary public. Please do so within thirty (30) days.
14 If you fail to sign the transcript within thirty (30)
15 days, it will be delivered to the appropriate parties
16 without signature. Return the transcript with
17 corrections, if any, to:

18 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL
19 BY: AIMEE COWAN, A.A.G.
20 300 South State Street, Suite 300
21 Syracuse, New York 13202

22 CORRECTIONS:

23 _____ Word or phrase: _____
24 _____ Corrected to: _____

25 _____ Word or phrase: _____
_____ Corrected to: _____

_____ Word or phrase: _____
_____ Corrected to: _____

_____ Word or phrase: _____
_____ Corrected to: _____

_____ Word or phrase: _____
_____ Corrected to: _____

_____ Word or phrase: _____
_____ Corrected to: _____

_____ Word or phrase: _____
_____ Corrected to: _____

_____ Corrected to: _____

24 Date Signed
25 ARII@courtsteno.com

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AMY KING

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